

With reference to MPEP 2143.01, the Examiner is requested to consider the findings of *In re Lee*, 277 F.3d 1338, 1342-44, 61 USPQ2d 1430, 1433-34 (Fed. Cir. 2002). That Decision discusses the importance of relying on objective evidence and making specific factual findings with respect to the motivation to combine references.

In the present case, the Examiner has presented no objective evidence and made no specific factual findings to support his assertion that there was motivation to combine the cited reference. A mere allegation of "providing ease for the user" falls well short of the criteria required to support a *prima facie* case of obviousness, with respect to the motivation to combine references.

The Examiner is invited to either withdraw his rejection or to provide specific objective evidence as to why the skilled person would *a priori* have considered combining Ikeda, Johnson and Sekendur.

It is respectfully submitted that all of the Examiner's objections have been successfully traversed. Accordingly, it is submitted that the application is now in condition for allowance. Reconsideration and allowance of the application is courteously solicited.

Very respectfully,

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